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CJA Counsel for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	Case No.: 3:24-cr-00052-JMK-MMS
)	
Plaintiff,)	
)	MOTION FOR BAIL HEARING
)	AND TEMPORARY RELEASE
vs.)	
)	
)	
EVELYN SIZEMORE)	
)	
Defendant.)	
)	

COMES NOW, Defendant Evelyn Sizemore, by and through his counsel of record, Hatton Greer of Carlson Law Group, LLC, hereby moves this Honorable Court to hold a bail hearing. Evelyn seeks authorization for a temporary release allowing her to be released for the purposes of employment. Evelyn's occupation is in the wedding business and she has a wedding taking place on June 8, 2024. Therefore, Evelyn requests that her bail hearing be considered at her Arraignment currently set for June 4, 2024 (docket 3).

The issue before the Court is whether there are a set of release conditions that will reasonably assure Evelyn's appearance at trial and/or not endanger the safety of any other person or the community.¹ Evelyn is not charged with a violent crime nor does her history give rise to the rebuttable presumption that no condition or combination of condition will reasonably assure the safety of any other person and the community or her appearance at trial.² Evelyn lives in Alaska, is employed in Alaska, and has no desire to leave the state. Furthermore, Evelyn has already been completing pretrial services for the State's case since June 2023 without issue.

For the aforementioned reasons, Evelyn respectfully requests this Court to release her on her own recognizance so that she may fulfill her obligations with her wedding business and may continue her pretrial services. Moreover, Evelyn requests that her bail hearing be considered at her Arraignment currently set for June 4, 2024 (docket 3).

Respectfully submitted this 29th day of May 2024.

/S/ Hatton Greer
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¹ 18 U.S.C. §3142(c)(1).

² *Id.* at (e)(2).

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 29th day of May 2024, a true and accurate copy of the Foregoing Document has been caused to be served via electronic filing to the parties, including:

USA S. Lane Tucker
AUSA Amy E. Miller

/S/ Hatton Greer
Hatton Greer